

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

December 27, 2021

*Memo Endorse*

*12/27/21*

*OK*

**BY ECF**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Mario Martinez Beltran,  
21 Cr. 473 (CM)**

*Colleen McMahon*

Dear Judge McMahon:

I write to request that the Court temporarily modify the home-detention condition of Mr. Martinez Beltran's bail release in order to permit him to participate in his family's annual tradition of celebrating New Year's Eve in the home of his daughter's grandmother, Lilia Ramos, who lives a few blocks from Mr. Martinez Beltran. Specifically, we ask that Mr. Martinez Beltran be permitted to be out of his home from 9:00 p.m. on December 31 to 2:00 a.m. on January 1. Ms. Ramos' address has been provided to Pretrial Services.

Pretrial Services advises that it does not consent to social requests for defendants on home detention as a general policy matter. The government defers to Pretrial Services regarding this request.

Pretrial Services confirms that Mr. Martinez Beltran remains in compliance with his bail conditions since his arrest six months ago. Therefore, and in the absence of any reason why allowing Mr. Martinez Beltran to be with his family a few blocks from his home for a few hours on New Year's Eve would pose a risk of flight or danger to the community, the Court should grant him this kindness.

Respectfully submitted,

*/s/*

Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

cc: AUSA Danielle Kudla  
USPSO Jonathan Lettieri (by email)